

FILED BY *[Signature]* D.C.

DEC 07 2023

ANGELA E. NOBLE
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S. D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Civil Case Number: _____

Luis Moya

(Write the full name of the plaintiff)

vs.

- G.E. O. Group South Bay C.I.
- Florida Department of Corrections

PROVIDED TO AVON PARK
CORRECTIONAL INSTITUTION
ON 12-3-23 FOR MAILING
BY *[Signature]*

(Write the full name of the defendant/s in this case)

COMPLAINT UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983

I. Party Information

A. Plaintiff: Luis Moya

Avon Park, FL

Address: 6100 Highway 64 East, Avon Park, FL 33825

Inmate/Prison No.: M 37778

Year of Birth: 1967 (Do not include day or month, pursuant to Fed. R. Civ. P 5.2)

(Write your name, address and prison/inmate number, if applicable)

vs.

B. Defendant: G.E. O. Group Defendant: F.D.O.C.

Official Position: _____ Official Position: _____

Place of Employment: South Bay C.I. Place of Employment: Tallahassee, FL

(Write the full name of each defendant, official position and place of employment. Attach a separate page if you need additional space for additional defendants.)

II. Statement of Claim

Briefly describe the facts of your case. Describe how each defendant is involved, names of other persons involved, and dates and places. Each claim should be stated in a separately numbered paragraph. Please use short and plain statements, with separately numbered paragraphs indicating why the relief requested should be granted. Do not include legal arguments or cite cases or statutes. Attach additional pages, if necessary.

Please see attached pages

III. Relief Requested

Briefly state what you are requesting from the Court (what do you want the Court to do). Do not include legal arguments or cite cases or statutes. Attach additional pages, if necessary.

Please see attached pages

IV. Jury Demand

Are you demanding a jury trial? Yes No

Signed this 28th day of November, 2023



Signature of Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 28th day of November 2023



Signature of Plaintiff

I was attack on 25 January 2023 at and around 9:15 A.M.. G.E.O. Group was and still runs the camp South Bay C.I., On that morning there was only 2 T.A.s in the Officer's Booth when I was attacked. The T.A.s released all 5 wings at the same time into the hallway. There must of been around 250 inmates waiting in the hallway waiting to be released. The hallway was full with inmates and there was no officers in the hallway to overlook all the inmates. There was no Sgt, that by D.O.C. regulation should of been there. If there would of been a Sgt there, all wings would of been inside the wings instead of outside. So, while I was waiting to get released, I felt a heavy object hit the side of my head. Blood started spilling onto my shoulders and toward the floor. I saw who did it and I chased him to his wing but I lost him because of all the people blocking my way. I went to the booth and showed I was attacked. I was rushed to the infirmary and than to the hospital, where I was stitched up and sent back to South Bay C.I.. I was given stitches for a 7 inch gash/cut to the left side of my head and part of my face. They had to repair some nerve damage that now I can't move my left eye/brow because of it. I was put into confinement and transferred.

I am also adding Florida Department of Corrections because they are to make sure G.E.O. Group is running South Bay C.I. accordingly and with the correct amount of correction officers. Plus, those T.A.s were not suppose to be alone on that shift, I made all grievances and 303's that I was to do before doing this lawsuit and the grievance were all denied.

I am requesting monetary compensation & punitive damages for physical and psychological trauma, from both G.E.O. Group and Florida Department of Corrections. I have a scar on my left side of my head and partial on my face. This scar makes me look like if I was a snitch, because in prison people with these scars are marked this way so everyone that see them looks at them as such. And a lot of people ask me if I stitched because they see my scar and it puts me in danger cause nobody wants a snitch as a bunkie or even living in their wing. I have constant headaches because of where I was struck and cut. I can't sleep on my left side because the headaches and sharp pains don't let me sleep. My left eyebrow does not move because the nerve was cut and was not able to be saved. And now I have Vertigo and have to be taking Meclizine 25mg 1 tablet twice a day. If I don't take it, the entire world spins and I can't walk or even sit up. And the worst part of my trauma is, I'm a Army Veteran and while serving I was attacked by a Palestinian. He tried killing me with a bayonet (military knife). I was able to escape but he did give me a 5 inch cut around the same area as this attack was on my head. And now, that has triggered me thinking of the day I was almost killed by that Palestinian.

• I am asking for \$350,000.00 from G.E.O. Group SouthBay C.I. for physical & psychological trauma and punitive damages

• And also asking \$ 350,000.00 for not overseeing G.E.O. Group SouthBay C.I. for safety of myself and other inmates.

I can't function on a daily basis without my prescribed medicine. And my physical and psychological trauma has ruined my well being.

Avon Park C.I.,
8100 Highway 64 East
Avon Park, FL 33825

Clerk's Office
United States District Court
Southern District of Florida
400 North Miami Ave, 8NO9
Miami, FL 33128-7716

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